

FAEGRE DRINKER BIDDLE & REATH LLP

JORI M. LOREN (*Admitted pro hac vice*)

jori.loren@faegredrinker.com

320 South Canal Street, Suite 3300

Chicago, IL 60606

Telephone: +1 (312) 356-5116

Facsimile: +1 (312) 569-3000

NICHOLAS J. BEGAKIS (BAR NO. 253588)

nicholas.begakis@faegredrinker.com

1800 Century Park East, Suite 1500

Los Angeles, California 90067

Telephone: +1 310 203 4000

Facsimile: +1 310 229 1285

Attorneys for Defendants

TIKTOK INC. and BYTEDANCE INC

[Additional Counsel on Signature Page]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION,

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

Personal Injury Bellwether Plaintiffs

**OMNIBUS SEALING STIPULATION
REGARDING DECLARATION OF
JORI M. LOREN IN RESPONSE TO
MAGISTRATE JUDGE KANG'S MAY
30, 2025 ORDER**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's May 22, 2023 Protective Order (Dkt. No. 290) and August 1, 2023 Order Granting Motion to File Under Seal; Setting Sealing Procedures (Dkt. No. 341), Defendants and Plaintiffs (collectively, the "Parties") submit this Omnibus Sealing Stipulation regarding the Declaration of Jori M. Loren in Response to Magistrate Judge Kang's May 30, 2025 Order ("Loren Declaration") (Dkt. No. 2004).

On June 2, 2025, Defendants filed the Loren Declaration (Dkt. No. 2004) along with a Temporary Sealing Motion (Dkt. No. 2005). Defendants filed exhibits to the Loren Declaration with confidentiality redactions (Dkt. Nos. 2005-1 through 2005-10) and submitted sealed unredacted copies of the exhibits to the Loren Declaration to the Court.

The Parties now agree that the following portions of the exhibits to the Loren Declaration should remain sealed.

| Dkt. No. | Description | Requested Action | Designating Party | Basis For Sealing | Whether Previously Sealed |
|----------|------------------------|--------------------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| 2005-4 | Exh. C. to Loren Decl. | Maintain all Redactions. | Plaintiffs | Good cause exists to seal the redacted information because it contains information about potentially explicit material interacted with by plaintiff Melton. <i>See In re M.T.</i> , 106 Cal. App. 5th 322, 336 (2024) (observing, "it is appropriate to seal certain records when those particular records contain highly sensitive and potentially embarrassing personal information about individuals"); Declaration of Jori M. Loren ¶ 2. | A party has not previously sought to seal the same information. |
| 2005-6 | Exh. E. to Loren Decl. | Maintain all Redactions | Plaintiffs | Good cause exists to seal the redacted | A party has not |

| Dkt. No. | Description | Requested Action | Designating Party | Basis For Sealing | Whether Previously Sealed |
|----------|------------------------|---------------------------------------------------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| | | | | information because it includes the plaintiff D'Orazio's personal email addresses and a summary of deposition testimony the Parties have designated as confidential. Declaration of Jori M. Loren ¶ 2. | previously sought to seal the same information. |
| 2005-7 | Exh. F. to Loren Decl. | Maintain redactions on pg. 1 and modify redactions on pg. 2 to redact names of additional applications. | Plaintiffs | Good cause exists to seal the redacted information because it includes the names of third-party witnesses, a summary of deposition testimony the Parties have designated as confidential, and about potentially explicit material interacted with by Plaintiff M.G. Declaration of Jori M. Loren ¶ 2. | A party has not previously sought to seal the same information. |
| 2005-8 | Exh. G. to Loren Decl. | Maintain Redactions | Plaintiffs | Good cause exists to seal the redacted information because it contains information about potentially explicit material interacted with by plaintiff Clevenger. Declaration of Jori M. Loren ¶ 2. | A party has not previously sought to seal the same information. |
| 2005-9 | Exh. H. to Loren Decl. | Modify Redactions at pg. 1 to | Plaintiffs | Good cause exists to seal the redacted | A party has not previously |

| Dkt. No. | Description | Requested Action | Designating Party | Basis For Sealing | Whether Previously Sealed |
|----------|------------------------|---------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| | | redact plaintiff J.D.'s name on subject line. | | information because it includes plaintiff J.D.'s last name, the names of individuals whose Facebook accounts that J.D. disclaimed, and a summary of deposition testimony the Parties have designated as confidential. Declaration of Jori M. Loren ¶ 2. | sought to seal the same information. |
| 2005-10 | Exh. I. to Loren Decl. | Modify redactions to redact information concerning a topic discussed during a deposition and the name of a third-party witness. | Plaintiffs | Good cause exists to seal the redacted information because it includes a summary of deposition testimony the Parties have designated as confidential and the full name of a third-party witness. Declaration of Jori M. Loren ¶ 2. | A party has not previously sought to seal the same information. |

Pursuant to this Court's sealing procedures, the following are attached hereto: (i) modified copies of Dkt Nos. 2005-7, 2005-9, and 2005-10 with the redactions agreed by the Parties; (ii) the Declaration of Jori Loren supporting the requests to seal; and (iii) a Proposed Order On Undisputed Sealing Requests.

IT IS SO STIPULATED AND AGREED:

Date: June 23, 2025

Respectfully submitted,

By: /s/ Lexi J. Hazam
 LEXI J. HAZAM
**LIEFF CABRASER HEIMANN &
 BERNSTEIN, LLP**
 275 Battery Street, 29th Floor
 San Francisco, CA 94111-3339

Telephone: 415-956-1000
lhazam@lchb.com

PREVIN WARREN
MOTLEY RICE LLC
401 9th Street NW Suite 630
Washington DC 20004
Telephone: 202-386-9610
pwarren@motleyrice.com
Co-Lead Counsel

CHRISTOPHER A. SEEGER
SEEGER WEISS, LLP
55 CHALLENGER ROAD, 6TH FLOOR
RIDGEFIELD PARK, NJ 07660
Telephone: 973-639-9100
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel
JENNIE LEE ANDERSON
ANDRUS ANDERSON, LLP
155 MONTGOMERY STREET, SUITE 900
SAN FRANCISCO, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

Liaison Counsel

EMILY C. JEFFCOTT
MORGAN & MORGAN
633 WEST FIFTH STREET, SUITE 2652
LOS ANGELES, CA 90071
Telephone: 213-787-8590
ejeffcott@forthepeople.com

JOSEPH VANZANDT
BEASLEY ALLEN
234 COMMERCE STREET
MONTGOMERY, LA 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

Federal/State Liaisons

MATTHEW BERGMAN
GLENN DRAPER
SOCIAL MEDIA VICTIMS LAW CENTER
821 SECOND AVENUE, SUITE 2100
SEATTLE, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org
glenn@socialmediavictims.org

1 JAMES J. BILSBORROW
2 **WEITZ & LUXENBERG, PC**
3 700 BROADWAY
4 NEW YORK, NY 10003
5 Telephone: 212-558-5500
6 jbilborrow@weitzlux.com

7 JAYNE CONROY
8 **SIMMONS HANLY CONROY, LLC**
9 112 MADISON AVE, 7TH FLOOR
10 NEW YORK, NY 10016
11 Telephone: 917-882-5522
12 jconroy@simmonsfirm.com

13 ANDRE MURA
14 **GIBBS LAW GROUP, LLP**
15 1111 BROADWAY, SUITE 2100
16 OAKLAND, CA 94607
17 Telephone: 510-350-9717
18 amm@classlawgroup.com

19 ALEXANDRA WALSH
20 **WALSH LAW**
21 1050 Connecticut Ave, NW, Suite 500
22 Washington D.C. 20036
23 Telephone: 202-780-3014
24 awalsh@alexwalshlaw.com

25 MICHAEL M. WEINKOWITZ
26 **LEVIN SEDRAN & BERMAN, LLP**
27 510 WALNUT STREET
28 SUITE 500
PHILADELPHIA, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership
RON AUSTIN
RON AUSTIN LAW
400 MANHATTAN BLVD.
HARVEY, LA 70058
Telephone: 504-227-8100
raustin@ronaustinlaw.com

PAIGE BOLDT
WALSH LAW
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@alexwalshlaw.com

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2
3
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15
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17
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19
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21
22
23
24
25
26
27
28

THOMAS P. CARTMELL
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: 816-701-1100
tcartmell@wcllp.com

SARAH EMERY
HENDY JOHNSON VAUGHN EMERY PSC
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KT 40202
Telephone: 859-600-6725
semery@justicestartshere.com

CARRIE GOLDBERG
C.A. GOLDBERG, PLLC
16 Court St.
Brooklyn, NY 11241
Telephone: 646-666-8908
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.
HENDY JOHNSON VAUGHN EMERY PSC
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KT 40202
Telephone: 859-578-4444
rjohnson@justicestartshere.com

SIN-TING MARY LIU
**AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC**
17 EAST MAIN STREET, SUITE 200
PENSACOLA, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 HUDSON YARDS, 11TH FLOOR
NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

JOSEPH E. MELTER
**KESSLER TOPAZ MELTZER & CHECK
LLP**
280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
jmeltzer@ktmc.com

HILLARY NAPPI
HACH & ROSE LLP
112 Madison Avenue, 10th Floor
New York, New York 10016
Telephone: 212-213-8311
hnappi@hrsclaw.com

EMMIE PAULOS
LEVIN PAPANTONIO RAFFERTY
316 SOUTH BAYLEN STREET, SUITE 600
PENSACOLA, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

RUTH THI RIZKALLA
THE CARLSON LAW FIRM, PC
1500 ROSECRANS AVE., STE. 500
MANHATTAN BEACH, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: 818-839-2333
rtellis@baronbudd.com
dfernandes@baronbudd.com

MELISSA YEATES
**KESSLER TOPAZ MELTZER & CHECK
LLP**
280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
myeates@ktmc.com

DIANDRA “FU” DEBROSSE ZIMMERMANN
DICELLO LEVITT
505 20th St North
Suite 1500
Birmingham, Alabama 35203
Telephone: 205-855-5700
fu@dicellolevitt.com

Plaintiffs’ Steering Committee Membership

Attorneys for Individual Plaintiffs

COVINGTON & BURLING LLP

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

COVINGTON & BURLING LLP
Phyllis A. Jones, Admitted *pro hac vice*
Paul W. Schmidt, Admitted *pro hac vice*
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: + 1 (202) 662-6000
Facsimile: + 1 (202) 662-6291
Email: pajones@cov.com

*Attorney for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings,
LLC; Facebook Operations, LLC; Facebook
Payments, Inc.; Facebook Technologies, LLC;
Instagram, LLC; Siculus, Inc.; and Mark Elliot
Zuckerberg*

FAEGRE DRINKER LLP

By: /s/ Jori M. Loren
Nicholas J. Begakis
Faegre Drinker Biddle and Reath LLP
1800 Century Park East, Suite 1500
Los Angeles, CA 90067
Telephone: (310) 203-4000
Facsimile: (310) 229-1285
Email: nicholas.begakis@faegredrinker.com

1 FAEGRE DRINKER LLP
2 Jori M. Loren Admitted *pro hac vice*
3 320 South Canal Street, Suite 3300
4 Chicago, IL 60606
5 Telephone: +1 (312) 356-5116
6 Facsimile: +1 (312) 569-3000
7 Email: amy.fiterman@faegredrinker.com

8 KING & SPALDING LLP
9 Geoffrey Drake, Admitted *pro hac vice*
10 1180 Peachtree Street, NE, Suite 1600
11 Atlanta, GA 30309
12 Tel.: 404-572-4600
13 Email: gdrake@kslaw.com
14 Email: dmatter@kslaw.com

15 KING & SPALDING LLP
16 David Mattern, Admitted *pro hac vice*
17 1700 Pennsylvania Avenue, NW, Suite 900
18 Washington, D.C. 20006
19 Telephone: +1 (202) 626-2946
20 Email: dmatter@kslaw.com

21 *Attorneys for Defendants TikTok Inc. and*
22 *ByteDance Inc.*

23 MUNGER, TOLLES & OLSON LLP
24 By: /s/ Jonathan H. Blavin
25 Jonathan H. Blavin, SBN 230269
26 MUNGER, TOLLES & OLSON LLP
27 560 Mission Street, 27th Floor
28 San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077
Email: jonathan.blavin@mto.com

Rose L. Ehler (SBN 29652)
Victoria A. Degtyareva (SBN 284199)
Laura M. Lopez, (SBN 313450)
Ariel T. Teshuva (SBN 324238)
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702
Email: rose.ehler@mto.com
Email: victoria.degtyareva@mto.com
Email: Ariel.Teshuva@mto.com

1 Lauren A. Bell (*pro hac vice forthcoming*)
2 MUNGER, TOLLES & OLSON LLP
3 601 Massachusetts Ave., NW St.,
4 Suite 500 E
5 Washington, D.C. 20001-5369
6 Telephone: (202) 220-1100
7 Facsimile: (202) 220-2300
8 Email: lauren.bell@mto.com

9 *Attorneys for Defendant Snap Inc.*

10 WILSON SONSINI GOODRICH & ROSATI
11 Professional Corporation
12 By: /s/ Brian M. Willen
13 Brian M. Willen (*pro hac vice*)
14 1301 Avenue of the Americas, 40th Floor
15 New York, New York 10019
16 Telephone: (212) 999-5800
17 Facsimile: (212) 999-5899
18 Email: bwillen@wsgr.com

19 WILSON SONSINI GOODRICH & ROSATI
20 Lauren Gallo White (SBN 309075)
21 Samantha A. Machock (SBN 298852)
22 One Market Plaza, Spear Tower, Suite 3300
23 San Francisco, CA 94105
24 Telephone: (415) 947-2000
25 Facsimile: (415) 947-2099
26 Email: lwhite@wsgr.com
27 Email: smachock@wsgr.com

28 WILSON SONSINI GOODRICH & ROSATI
Christopher Chiou (SBN 233587)
Matthew K. Donohue (SBN 302144)
953 East Third Street, Suite 100
Los Angeles, CA 90013
Telephone: (323) 210-2900
Facsimile: (866) 974-7329
Email: cchiou@wsgr.com
Email: mdonohue@wsgr.com

Attorneys for Defendants YouTube, LLC and Google LLC

1 WILLIAMS & CONNOLLY LLP
2 By: /s/ Joseph G. Petrosinelli
3 Joseph G. Petrosinelli (*pro hac vice*)
4 jpetrosinelli@wc.com
5 Ashley W. Hardin (*pro hac vice*)
6 ahardin@wc.com
7 680 Maine Avenue, SW
8 Washington, DC 20024
9 Telephone.: 202-434-5000
10 Fax: 202-434-5029

11 *Attorneys for Defendants YouTube, LLC and*
12 *Google LLC*

13 MORGAN, LEWIS & BOCKIUS LLP
14 By: /s/ Yarden R. Zwang-Weissman
15 Yarden R. Zwang-Weissman (SBN 247111)
16 300 South Grand Avenue, 22nd Floor
17 Los Angeles, CA 90071-3132
18 Tel.: 213.612.7238
19 Email:yarden.zwang-
20 weissman@morganlewis.com

21 MORGAN, LEWIS & BOCKIUS LLP
22 Brian Ercole (*pro hac vice*)
23 600 Brickell Avenue, Suite 1600
24 Miami, FL 33131-3075
25 Tel.: 305.415.3416
26 Email: brian.ercole@morganlewis.com

27 MORGAN, LEWIS & BOCKIUS LLP
28 Stephanie Schuster (*pro hac vice*)
1111 Pennsylvania Avenue NW
NW Washington, DC 20004-2541
Tel.: 202.373.6595
Email: stephanie.schuster@morganlewis.com

Attorneys for Defendants YouTube, LLC and
Google LLC